Frontier Corporation

frontier

Legal Services

180 South Clinton Avenue
Rochester, NY 14646-0700
716-546-7823 fax

Michael J. Shortley, III
Senior Attorney

Telephone: (716) 777-1028

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BY OVERNIGHT MAIL

Mr. William F. Caton
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Re: CC Docket No. 96-45

Dear Mr. Caton:

Enclosed for filing please find an original plus four (4) copies of the Comments of Frontier Corporation in the above-docketed proceeding.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed, self-addressed envelope.

Very truly yours,

Michael J. Shortley, III

cc: International Transcription Service

Ms. Sheryl Todd,
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Federal-State Joint Board	)	**CC Docket No. 96-45**
on Universal Service	)	

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TO: THE COMMISSION

COMMENTS OF FRONTIER CORPORATION

Michael J. Shortley, III

Attorney for Frontier Corporation

180 South Clinton Avenue
Rochester, New York 14646
(716) 777-1028

December 18, 1996

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Summary

Frontier submits these comments on the Recommended Decision of the Federal-State Joint Board.[1] Although the Joint Board has done a commendable job in issuing its recommended decision, much work remains to be done. Critical issues still need to be addressed in a relatively short time and, indeed, the size of the federal universal service fund is still undetermined as is the distribution of the recipients. The size, scope and complexity of the task facing the Commission counsels caution. At this stage, the Commission's first order of business should be to limit the size of the fund to the minimum necessary to comply with the universal service requirements contained in the Act and to minimize the economic distortions that operate to erode consumer benefits. Toward this end, the Commission should supplement and modify the recommended decision in a number of significant respects.

First, whichever proxy cost model that the Commission ultimately adopts, it should mandate a specifically-defined geographic area that will be utilized to measure eligibility for federal support payments. Leaving this matter to the discretion of the states raises the potential for gaming the system to maximize the level of federal support that flows to individual states. As an alternative, Frontier suggests that, for non-rural telephone companies, the Commission utilize the zones established for pricing purposes as the basis for the proxy cost model area definitions. Those are already known and, moreover, negate

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1 The abbreviations used herein are defined in the text.

incentives to define areas as high cost or low cost for one purpose (receipt of universal service support) but not for another (pricing).

Second, the Commission should adopt a minimum threshold of proxy costs minus benchmark-revenues-per-line below which an area would not qualify for any federal universal service support. Receipt of a minimal amount of support per line truly does not constitute support for serving high cost areas. Rather, it constitutes earnings support for recipients. Moreover, such "minimal" amounts aggregate to significant burdens on contributing carriers.

Third, the Commission should require an increase in the residential and single-line business subscriber line charge. That charge has not risen, even to account for inflation, in twelve years. The basis for recovery of certain fixed, or non-traffic-sensitive, costs through fixed charges remains valid. It is far preferable to permit relatively modest increases in subscriber bills than to retain the current -- and artificially low -- subscriber line charge and to export the difference to net fund contributors.

Fourth, the Commission should reaffirm the dichotomy enunciated in section 254(f) of the Act between federal and state universal service support by utilizing federal universal service support to fund only interstate telecommunications. Frontier suggests that the Commission utilize the frozen twenty-five percent subscriber plant factor as the basis for determining the amount of support payable from the federal universal service fund.

Fifth, the Commission should, for federal funding purposes, combine rural health care and school and library support into a single capped fund. These are two of the great unknowns in the universal service picture, and the Commission should tread with particular caution in this area. Moreover, the Commission should establish that this portion of the fund be used solely for telecommunications services provided up to a defined demarcation point and that nothing on the institution's side of the demarcation point qualify for universal service support. In particular, the Commission should decline to adopt the recommendation of the Joint Board that inside wiring for schools qualify for support. That recommendation is unworkable, inconsistent with the Act and undesirable.

Sixth, the Commission should confine itself to assessing contributions for universal service support on the basis of interstate revenues only. Interstate revenues should be the basis for support of interstate telecommunications. This limitation is necessary to ensure accountability for the size and scope of both the interstate *and* intrastate funds that will exist.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	**CC Docket No. 96-45**
	)	

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TO: THE COMMISSION

COMMENTS OF FRONTIER CORPORATION

Introduction

Frontier Corporation ("Frontier") submits these comments on the Recommended Decision of the Federal-State Joint Board.[1] Although the Joint Board has done a commendable job in issuing its recommended decision, much work remains to be done. Critical issues still need to be addressed in a relatively short time and, indeed, the size of the federal universal service fund[2] is still undetermined as is the distribution of the recipients. The size, scope and complexity of the task facing the Commission counsels caution. At this stage, the Commission's first order of business should be to limit the size of the fund to the minimum necessary to comply with the universal service requirements

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1 *Federal-State Joint Board on Universal Service*, CC Dkt. 96-45, Recommended Decision, FCC 96J-3 (Nov. 8, 1996) ("Recommended Decision").

2 The size and scope of the federal universal service fund is important, not only in and of itself, but also because it will profoundly affect decisions regarding the size and scope of state universal service funds provided for under section 254(f) of the Communications Act, as amended by the Telecommunications Act of 1996 ("Act").

contained in the Act[3] and to minimize the economic distortions that operate to erode consumer benefits. Toward this end, the Commission should supplement and modify the recommended decision in a number of significant respects.

First, whichever proxy cost model that the Commission ultimately adopts, it should mandate a specifically-defined geographic area that will be utilized to measure eligibility for federal support payments. Leaving this matter to the discretion of the states raises the potential for gaming the system to maximize the level of federal support that flows to individual states. As an alternative, Frontier suggests that, for non-rural telephone companies, the Commission utilize the zones established for pricing purposes[4] as the basis for the proxy cost model area definitions. Those are already known and, moreover, negate incentives to define areas as high cost or low cost for one purpose (receipt of universal service support) but not for another (pricing).

Second, the Commission should adopt a minimum threshold of proxy costs minus benchmark-revenues-per-line below which an area would not qualify for any federal universal service support. Receipt of a minimal amount of support per line truly does not constitute support for serving high cost areas.

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3 47 U.S.C. § 254.

4 *See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Dkt. 96-98, First Report and Order, FCC 96-325, ¶ 765 (Aug. 8, 1996), *appeal pending sub nom., Iowa Utilities Board v. FCC,* No. 96-3321 (8th Cir.); *see also Expanded Interconnection with Local Telephone Company Facilities*, CC Dkt. 91-141, Report and Order and Notice of Proposed Rulemaking, 7 FCC Rcd. 7369, 7454-57 (1992), *vacated on other grounds sub nom., Bell Atlantic v. FCC,* 24 F.3d 1441 (D.C. Cir. 1994).

Rather, it constitutes earnings support for recipients. Moreover, such "minimal" amounts aggregate to significant burdens on contributing carriers.

Third, the Commission should require an increase in the residential and single-line business subscriber line charge. That charge has not risen, even to account for inflation, in twelve years. The basis for recovery of certain fixed, or non-traffic-sensitive, costs through fixed charges remains valid. It is far preferable to permit relatively modest increases in subscriber bills than to retain the current -- and artificially low -- subscriber line charge and to export the difference to net fund contributors.

Fourth, the Commission should reaffirm the dichotomy enunciated in section 254(f) of the Act between federal and state universal service support by utilizing federal universal service support to fund only interstate telecommunications. Frontier suggests that the Commission utilize the frozen twenty-five percent subscriber plant factor as the basis for determining the amount of support payable from the federal universal service fund.

Fifth, the Commission should, for federal funding purposes, combine rural health care and school and library support into a single capped fund. These are two of the great unknowns in the universal service picture, and the Commission should tread with particular caution in this area. Moreover, the Commission should establish that this portion of the fund be used solely for telecommunications services provided up to a defined demarcation point and that nothing on the institution's side of the demarcation point qualify for universal service support. In particular, the Commission should decline to adopt the recommendation of the Joint Board that inside wiring for schools qualify for support. That recommendation is unworkable, inconsistent with the Act and undesirable.

Sixth, the Commission should confine itself to assessing contributions for universal service support on the basis of interstate revenues only. Interstate revenues should be the basis for support of interstate telecommunications. This limitation is necessary to ensure accountability for the size and scope of both the interstate *and* intrastate funds that will exist.

Argument

I. THE COMMISSION SHOULD UTILIZE THE EXISTING DENSITY PRICING ZONES FOR ESTABLISHING THE GEOGRAPHIC AREAS TO BE UTILIZED FOR DETERMINING PROXY COSTS.

Proxy costs will -- as they correctly should -- be utilized to determine which carriers will receive universal service support.[5] Benchmark revenues will fill the other side of the equation.[6] The cost models must be relatively easy to

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5 The Joint Board has correctly recommended that -- with the exception of a transition period for rural carriers -- proxy, as opposed to actual, costs will be utilized for the purpose of defining a high cost area. Recommended Decision, ¶¶ 172-74.

6 The Joint Board has also correctly recommended that benchmark -- as opposed to actual -- revenues be utilized. *Id.*, ¶ 311. The recommendation regarding what constitutes average-revenue-per-line, however, is slightly ambiguous. *See id.* ¶ 310 ("Revenues-per-line are the sum of the revenue generated by local, discretionary, access services *and others as found appropriate* divided by the number of loops served.") (emphasis added). The Commission should clarify that average revenue per line includes *all* revenue, including intraLATA and interLATA toll revenue. The proxy costs are to be developed on an unseparated basis. Revenues -- the other half of the equation -- should be developed on the same basis.

replicate and, more importantly, not provide incentives to game the system. The Joint Board's recommendation, unfortunately, contains that very incentive. Leaving to the discretion of the states the size of the areas to be utilized for conducting cost studies[7] simply invites individual states to devise cost study rules that will maximize net inflows of subsidy revenues. This would result in a fund that is larger than necessary to provide universal service support and create economic distortions.[8]

As an alternative, Frontier suggests that the Commission prescribe the use of the existing density zones for non-rural telephone companies.[9] The zones already exist and are rationally related to transport costs.[10] Use of the

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In this regard, while Frontier agrees with the Joint Board that the Commission should not require rural carriers to develop proxy *cost* models immediately (*see id.*, ¶ 272), it should require the use of benchmark revenues for the purpose of the amount of support payable to individual companies immediately. Nationwide-average-revenue-per-line will not be a figure that is hard to derive. Thus, the Joint Board's legitimate concern that smaller carriers should not be burdened by producing detailed proxy cost studies in the near future is not implicated by this suggestion. Moreover, adoption of this suggestion would provide companies with the incentive to offer new services -- and thereby generate additional sources of revenue -- because any deficit between actual and benchmark revenues would not be captured through universal service support.

7 *Id.*, ¶¶ 175-78.

8 The other major proposal advocated -- use of census block groups -- is also misguided. The only real purpose to be served by conducting cost studies at the census block group level would be to maximize the size of the universal service fund. Moreover, the costs involved of conducting cost studies at the census block group level would be enormous. The Commission should decline to require that this exercise be undertaken.

9 *See supra* at 2 n.4.

10 *Id.*

Although transport and loop costs are not identical, there is strong reason to believe that they are rationally related. Density and average length of facilities are the major factors governing both transport costs and loop costs.

zone model would also produce areas for cost studies that are neither too large that they would mask internal subsidy flows nor too small that they would result in defining areas as high-cost where the need for high-cost support is questionable at best.

Moreover, tying the zones used for pricing purposes to areas that would be used for determining qualification for universal service support would create the correct economic incentives. For competitive pricing purposes, incumbent local exchange carriers would have every incentive to seek to include in zones 1 or 2 those end offices where competition (or the prospect of competition) is real. Yet, because these are the lower cost (and hence lower-priced areas), they would not qualify for universal service support. Only zone 3 end offices logically would be eligible for universal service support. Incumbent local exchange carriers would, however, be reluctant to include end offices in zone 3 because of the adverse pricing consequences.

Use of the density zones for universal service -- as well as pricing -- purposes would create the correct balancing of incentives that would help minimize the size of the federal universal service fund and target support only to those areas that are truly high cost.[11]

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11 Frontier recognizes that entities other than incumbent local exchange carriers may qualify for universal service support. For the nearer term, this is not likely to be a realistic concern as new entrants have targeted -- and will likely continue to target -- lower-cost areas. Nonetheless, for purposes of competitive neutrality, the Commission should classify new entrants' serving areas on the basis of the incumbents' zones. This is not to say that new entrants must serve all zone 3 areas served by the incumbent. Rather, only areas served by a new entrant within the incumbent's zone 3 would qualify for universal service support.

II. THE COMMISSION SHOULD ADOPT A MINIMUM THRESHOLD BELOW WHICH AN AREA WOULD NOT QUALIFY FOR UNIVERSAL SERVICE SUPPORT.

A large amount of current high-cost support is directed to companies that receive a nominal amount of assistance per access line, *i.e.*, less than one dollar per-month, per-line.[12] This minimal amount of assistance on a per-line basis itself calls into question whether such support is truly needed to offset high costs, or rather, constitutes earnings support. In addition, these "minimal" amounts of assistance, in the aggregate, impose substantial burdens on net contributors. The Commission's decision to use proxy costs and benchmark revenues itself will go a long way to eliminating this anomaly, particularly for larger exchange carriers, because support will no longer be based upon actual costs or actual revenues. Nonetheless, if the models indicate that a particular area is only slightly "below cost," there is no reason to believe that it should qualify for universal service support. The models themselves are proxies and slight differences between expected costs and expected revenues can safely be accounted for as being within the margin of error of such models. Thus, by adjusting the level slightly for areas that would otherwise receive nominal per-line support, the Commission will minimize the size of the federal universal service fund significantly and target support to those areas that are truly high-cost. Frontier suggests that the Commission set the threshold at one dollar per-month,

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12 *See* Recommended Decision, ¶ 219.

per-access line, and permit the shortfall to be recovered instead through a corresponding increase in the subscriber line charge.

III. THE COMMISSION SHOULD INCREASE THE RESIDENTIAL AND SINGLE-LINE BUSINESS SUBSCRIBER LINE CHARGE.

The most troubling aspect of the Joint Board's recommended decision is its recommendation that the Commission not increase (and possibly decrease) the residential and single-line business subscriber line charge.[13] The fact that a carrier common line charge exists at all is itself telling evidence that the current subscriber line charge is too low.[14] In addition, the current subscriber line charge has been frozen for approximately twelve years. The surest way to

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13 *Id.*, ¶ 769.

The Joint Board has also recommended that universal service support be directed to residential and single-line businesses for a defined group of core services. *Id.*, ¶¶ 45-53, 92. Frontier agrees that universal service support be utilized for residential service. However, it questions the need for providing support for any business services, including single-line business services. It does not appear necessary at this time, particularly when the size of the federal universal service fund in unknown, to provide even a lower level of support for single-line business services. If necessary, the Commission retains the flexibility to revisit this issue in the future.

In addition, the Joint Board has recommended that some level of usage qualify for universal service support. *Id.*, ¶ 49. The Commission should decline to adopt this suggestion. The costs that are to be subsidized, where necessary, are non-traffic-sensitive costs. They are basically loop costs. There is no credible evidence in the record that usage sensitive costs are "high." Moreover, the goal of universal service support is to maintain affordable *access* to the public switched network. There is no justification for subsidizing usage as well as access.

14 The Joint Board's recommendation (*id.*, ¶ 776) -- that incumbent local exchange carriers be permitted to bulk bill the carrier common line charge to interexchange carriers -- is economically unsound. Under accepted principles of cost causation, the costs of common lines should be borne by the cost causers, in this case, end-user customers.

minimize the size of the federal universal service fund is to realign rates to approximate costs more closely. Such a result would also be consistent with accepted principles of cost causation in that the users responsible for those costs would be required to bear those costs.

Unless it was actually the case that an increase in the federal subscriber line charge would significantly and adversely affect subscribership levels, there is no justification for refusing to require such an increase. The Joint Board's concern in this regard[15] appears unfounded and unsubstantiated. Great concern was expressed about subscribership levels when the federal subscriber line charge was first introduced; yet, subscribership levels today are at or near an all-time high. Particularly given that basic telephone service is highly demand inelastic, there is little *a priori* reason to believe that a modest increase in the federal subscriber line charge would adversely affect subscribership levels.[16] A goal of the federal universal service program should be to eliminate the most obvious subsidy currently embedded in rates, namely, the carrier common line charge. Requiring an increase in the maximum residential and single-line business subscriber line charge would constitute a significant step in the right direction.[17]

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15 *Id.*, ¶ 769.

16 To the extent that there may be some marginal effect on subscribership levels, that concern may best be addressed through the Lifeline and Link-Up programs that target support to low-income households.

17 Obviously, any increase in the subscriber line charge must be matched with a dollar-for-dollar decrease in the carrier common line charge.

IV. THE COMMISSION SHOULD CLARIFY THAT FEDERAL UNIVERSAL SERVICE SUPPORT ONLY CONTRIBUTES TO INTERSTATE SERVICES.

The Act contemplates that federal universal service support is to be used for *interstate* communications and that the states may establish separate programs for *intrastate* communications.[18] However, the proxy cost and revenue benchmark models that the Joint Board recommends are based upon total costs and total revenues on a non-jurisdictional basis. Although Frontier does not believe that the Joint Board so intended, there could exist the expectation that the entire amount of the indicated subsidy should be derived from the federal universal service fund.

The Commission should affirmatively state that federal universal service support will only contribute to that portion of costs attributable to the interstate jurisdiction. For this purpose, the Commission should utilize the frozen twenty-five percent subscriber plant factor. That is, of any indicated shortfall between indicated expenses and indicated revenues, the federal universal service fund will only support twenty-five percent of that differential. State support mechanisms, if any, should be required to make up the differential.

This jurisdictional split possesses several beneficial consequences. *First*, it explicitly separates federal and state responsibility for universal service support. This will permit the public to know the sources and recipients of support along clearly-delineated jurisdictional boundaries.

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[18] 47 U.S.C. § 254(f).

Second, it will bring desirable discipline to state universal service programs. Knowing in advance that state programs will be required to fund intrastate services will curb the tendencies that may exist to create unduly expansive definitions of universal service for intrastate purposes. Individual states would know that they could not effectively export the costs of basic intrastate services outside their borders and would thereby be less inclined to adopt unduly expansive definitions of what constitutes universal service (*e.g.*, fiber to the curb or home). Were the federal fund to cover all identified costs of providing core services that require support, this constraint would effectively disappear.

However, were a state to demonstrate a compelling need for a greater level of support from the federal fund than the proposed twenty-five percent allocator would allow, Frontier proposes that the Commission should entertain waiver petitions by affected states. Any such state petitioner should be required to demonstrate good cause, based upon a showing that it is an exceptionally high cost state, local rates are realistically set and populations are sparse.

V. THE COMMISSION SHOULD, FOR FUNDING PURPOSES, COMBINE, LIMIT AND CAP UNIVERSAL SERVICE SUPPORT FOR SCHOOLS, LIBRARIES AND RURAL HEALTH CARE FACILITIES.

The universal service support programs required by the Act for schools, libraries and rural health care providers constitute the two great unknowns in the universal service paradigm. The Joint Board could not recommend a list of services for rural health care providers that would qualify for support[19] and recommended a cap on support for schools and libraries.[20] These factors themselves counsel the Commission to act with extreme caution in this area, subject to possible revisitation later.

First, for funding purposes, the Commission should combine the schools and libraries and rural health care support programs and subject them to a single cap. Moreover, the cap proposed by the Joint Board for schools and libraries alone -- $2.25 *billion* per year -- seems unduly high. This figure is *three times* the amount of the current high-cost support program for telephone companies and ranges from ten percent to fifty percent of the support that parties have identified as necessary for high cost support for the nation as a whole. This proposed cap, moreover, does not even include rural health care providers.

The Commission should start from the opposite end of the spectrum. To ensure manageability and responsibility at the outset, the Commission should,

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[19] *Id.*, ¶ 10.

[20] *Id.*, ¶ 9.

for federal funding purposes, combine the two programs and subject them to a single cap. That cap, moreover, should be reduced substantially from the proposed $2.25 billion for schools and libraries alone. Frontier suggests a cap more on the order of $225,000,000 -- or one-third of the existing level of high-cost support -- for support for schools, libraries and rural health care providers.

Second, the Commission should confine any support for schools, libraries and rural health care providers only to telecommunications services. That is, only services provided by a telecommunications carrier up to a clearly defined demarcation point qualify for support. Anything on the institution's side of that point should not be eligible for support.

In particular, the Commission should reject the Joint Board's recommendation that "internal connections" for schools -- *i.e.,* inside wire -- qualify for support.[21] As is the case with computers, software and similar items, inside wire is not a telecommunications service that necessarily should qualify for support under the Act. The Commission should decline to embark upon the "slippery slope" about which Commissioner Chong warns.[22]

In addition, for whatever services for schools, libraries and rural health care facilities that qualify for support, the Commission should encourage states both to offer matching funds for such support and to tailor state programs such that the discounts proposed by the Joint Board are, in the aggregate, not

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[21] *Id.*, ¶¶ 446-84.

[22] *See* Dissenting Statement of FCC Commissioner Rachelle B. Chong at 5-10.

exceeded. The Commission should strongly discourage the states from adopting unduly expansive definitions of services for schools, libraries and rural health care facilities that qualify for support, thereby requiring the industry to foot the bill.

VI. THE COMMISSION SHOULD REQUIRE THAT CONTRIBUTIONS TO FEDERAL UNIVERSAL SERVICE SUPPORT BE DERIVED ONLY FROM INTERSTATE REVENUES.

The Joint Board has recommended that contributions for schools and libraries and rural health care support be based on total (*i.e.,* interstate and intrastate) revenues and has left open the question of how to calculate contributions to the remainder of the federal universal service fund.[23] The Commission should decline to adopt the Joint Board's recommendation and, instead, calculate contributions to federal universal service programs on the basis of interstate revenues only.[24] As described above,[25] the Act establishes a federal/state dichotomy for purposes of universal service support. The Commission should adhere to this jurisdictional division of responsibility by

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[23] Recommended Decision, ¶¶ 817-23.

[24] Frontier agrees with the Joint Board's recommendation that payments be based on net revenues, that is, total revenues net of payments to other carriers. *Id.*, ¶ 809.

In addition, the Joint Board has recommended that the Commission take steps that would permit the National Exchange Carrier Association ("NECA") to qualify for the position of fund administrator. *Id.*, ¶¶ 830, 832. Frontier concurs in this recommendation. In particular, it believes that NECA, with a known track record of administering similar programs and having recently opened its board to the broader industry, could now qualify for as appointment as fund administrator.

[25] See *supra*, Part IV.

looking only to revenues within its sphere of authority to assess for universal service support.[26]

Conclusion

For the foregoing reasons, the Commission should act upon the Joint Board's recommendations consistent with the suggestions contained herein.

Respectfully submitted,

Michael J. Shortley, III

Attorney for Frontier Corporation

180 South Clinton Avenue
Rochester, New York 14646
(716) 777-1028

December 18, 1996

[26] *See* Separate Statement of Commissioner Kenneth McClure, *passim*; Separate Statement of Commissioner Laska Schoenfelder at 1-2.

Certificate of Service

I hereby certify that, on this 18th day of December, 1996, copies of the foregoing Comments of Frontier Corporation were served by first-class mail, postage prepaid, upon the parties on the attached service list.

Michael J. Shortley, III

Service List 73618

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

The Honorable Rachelle B. Chong, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

The Honorable Susan Ness, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

The Honorable Julia Johnson, Commissioner
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

The Honorable Kenneth McClure, Commissioner
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, MO 65101

The Honorable Sharon L. Nelson, Chairman
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

The Honorable Laska Schoenfelder, Commissioner
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol Street
Pierre, SD 57501-5070

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Jefferson City, MO 65102

Paul E. Pederson, State Staff Chair
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Lisa Boehley
Federal Communications Commission
2100 M Street, N.W., Room 8605
Washington, D.C. 20554

Charles Bolle
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol Street
Pierre, SD 57501-5070

Deonne Bruning
Nebraska Public Service Commission
300 The Atrium
1200 N Street, P.O. Box 94927
Lincoln, NE 68509-4927

James Casserly
Federal Communications Commission
Office of Commissioner Ness
1919 M Street, Room 832
Washington, D.C. 20554

John Clark
Federal Communications Commission
2100 M Street, N.W., Room 8619
Washington, D.C. 20554

Bryan Clopton
Federal Communications Commission
2100 M Street, N.W., Room 8615
Washington, D.C. 20554

73619

Irene Flannery
Federal Communications Commission
2100 M Street, N.W., Room 8922
Washington, D.C. 20554

Daniel Gonzalez
Federal Communications Commission
Office of Commissioner Chong
1919 M Street, N.W., Room 844
Washington, D.C. 20554

Emily Hoffnar
Federal Communications Commission
2100 M Street, N.W., Room 8623
Washington, D.C. 20554

L. Charles Keller
Federal Communications Commission
2100 M Street, N.W., Room 8918
Washington, D.C. 20554

Lori Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

David Krech
Federal Communications Commission
2025 M Street, N.W., Room 7130
Washington, D.C. 20554

Debra M. Kriete
Pennsylvania Public Utilities Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Diane Law
Federal Communications Commission
2100 M Street, N.W., Room 8920
Washington, D.C. 20554

Mark Long
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399

Robert Loube
Federal Communications Commission
2100 M Street, N.W., Room 8914
Washington, D.C. 20554

Samuel Loudenslager
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AR 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, Pennsylvania 17120

Michael A. McRae
D.C. Office of the People's Counsel
1133 15th Street, N.W. -- Suite 500
Washington, D.C. 20005

Tejal Mehta
Federal Communications Commission
2100 M Street, N.W., Room 8625
Washington, D.C. 20554

Terry Monroe
New York Public Service Commission
3 Empire Plaza
Albany, NY 12223

John Morabito
Deputy Division Chief, Accounting and Audits
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20554

Mark Nadel
Federal Communications Commission
2100 M Street, N.W., Room 8916
Washington, D.C. 20554

73620

John Nakahata
Federal Communications Commission
Office of the Chairman
1919 M Street, N.W., Room 814

Lee Palagyi
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
Olympia, WA 98504

Kimberly Parker
Federal Communications Commission
2100 M Street, N.W., Room 8609
Washington, D.C. 20554

Barry Payne
Indiana Office of the Consumer Counsel
100 North Senate Avenue, Room N501
Indianapolis, IN 46204-2208

Jeanine Poltronieri
Federal Communications Commission
2100 M Street, N.W., Room 8924
Washington, D.C. 20554

James Bradford Ramsay
National Association of Regulatory Utility Commissioners
P.O. Box 684
Washington, D.C. 20044-0684

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Gary Seigel
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20554

Richard Smith
Federal Communications Commission
2100 M Street, N.W., Room 8605
Washington, D.C. 20554

Pamela Szymczak
Federal Communications Commission
2100 M Street, N.W., Room 8912
Washington, D.C. 20554

Lori Wright
Federal Communications Commission
2100 M Street, N.W., Room 8603
Washington, D.C. 20554